

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to

All Cases

**DEFENDANTS' UNOPPOSED
MOTION FOR THE ISSUANCE OF
A LETTER OF REQUEST FOR
INTERNATIONAL JUDICIAL
ASSISTANCE TO THE
APPROPRIATE JUDICIAL
AUTHORITIES IN AUSTRALIA**

Pursuant to 28 U.S.C. § 1781(b)(2) and Federal Rule of Civil Procedure 28(b), Defendants 3M™ Company and Arizant Healthcare Inc. (“Defendants”) respectfully move the Court for an order issuing a letter of request for international judicial assistance to the Principal Registrar of the Supreme Court of Western Australia. As set forth in the accompanying memorandum of law, Defendants seek assistance in obtaining testimony and documents from Dr. Kiran Dasari, who is an author on certain scientific literature cited and relied upon in Plaintiffs’ Master Long-Form Complaint and thus who has unique information that is relevant to plaintiffs’ allegations. Because Defendants cannot obtain the information at issue by other means, they respectfully request that the Court grant this motion and issue the proposed Letter of Request submitted as Exhibit 1. Plaintiffs have agreed not to oppose this motion.

Dated: August 1, 2016

Respectfully submitted,

s/Bridget M. Ahmann

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